

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION

Case No. 09-MD-2017 (LAK)

This Document Applies To:

*In re Lehman Brothers Equity/Debt
Securities Litigation*, 08-CV-5523 (LAK)

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR AUTHORIZATION
TO NOTIFY THE SETTLEMENT CLASS OF PROPOSED SETTLEMENT WITH
ERNST & YOUNG LLP AND TO SCHEDULE A SETTLEMENT HEARING**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law; and all other papers and proceedings herein, Plaintiffs will and hereby do move this Court, under Rule 23(e) of the Federal Rules of Civil Procedure, for authorization to provide notice of the proposed settlement with Ernst & Young LLP, and to schedule a hearing for consideration of approval of the proposed settlement. An agreed upon proposed form of proposed Order is submitted herewith.

DATED: November 27, 2013

Respectfully Submitted,

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